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Office of the Secretary
Federal Communications Commission
Washington, DC 20554

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REPLY COMMENTS IN THE MATTER OF:

Amendments to the amateur service rules)	
including amendments for examination credit,)	WT 95-57
eligibility for a club station license,)	
recognition of the volunteer examiner session)	RM-8301
manager, a special event call sign system, and)	RM-8418
and self-assigned indicator in the station)	RM-8462
identification.)	

To the Commission:

I. INTRODUCTION

The Commission's attention is invited to my comments dated July 12, 1995, with particular reference to Section II, "Examination Credit" and Section IV, "VE Session Manager".

II. DISCUSSION

EXAMINATION CREDIT

WT 95-57 states, "In petition RM-8418, the ARRL (American Radio Relay League) wants to encourage former amateur operators to become involved again in the technical self-training and public service communications opportunities provided by the amateur service." While I do not doubt that the ARRL very much does support that objective, the statement

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does not address the petition's original intent. In a public statement published in ARRL Bulletin #71, dated July 17, 1995, regarding it's comments, the ARRL said:

"A lifetime amateur operator license, originally proposed by the League in a petition filed January 6, 1994. The ARRL said in its comments that it believes a ''relatively substantial'' number of amateurs would benefit from such a lifetime license. However, the League said that the Commission's proposal is not quite what the 1994 petition requested, but, rather, that former licensees be given credit for examinations passed in the past. This would create an unnecessary burden for volunteer examiners, the League said, and would assign to them a function contrary to the Communications Act."

There is no reference in WT 95-57 to creating a lifetime amateur radio operator license. While granting permanent credit for having successfully passed an FCC qualifying examination has a similar effect, it is not the same thing and may have far reaching effects.

Amending the rules as proposed sets dangerous precedent with potential repercussions outside the amateur radio service. Making a change specifically effecting the administration of a particular service is not likely to spill over into others if it is peculiar to only that one. However, modifying a rule in one service that is common to others suggests that the Commission has embraced the policy across the board and invites challenge and may make it so elsewhere.

As I argued in my original comments to the Commission, while continuous and uninterrupted activity does tend to maintain competency, allowing past credit without such a bridge is

inappropriate. Opening the door to persons without requiring them to demonstrate knowledge of current technology diminishes the certification's overall credibility and further devalues the amateur service's worth as a national technical resource.

I vehemently oppose establishment of a lifetime licensing, and in this case, allowing past examination credit as its negative effects overwhelmingly outweigh any benefit. I therefore strongly urge the Commission to dismiss this proposed amendment without further action.

VE SESSION MANAGER

In my above referenced comments, I stated that I favor adopting the amendment proposed in RM-8301 based on my belief that doing so may enhance the VEC system's integrity. After reviewing comments of the American Radio Relay League, I feel that a revision of my position on this subject is in order.

I am now convinced that the current requirement for three Volunteer Examiners to administer each examination is more effective in assuring the examination system's integrity. I therefore rescind my original support and endorse the ARRL's opposition to adopting this amendment.

Respectfully submitted:

A handwritten signature in black ink, appearing to read "Richard A. Stalls", written in a cursive style.

Richard A. Stalls, K4KY0